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7 *Attorneys for Plaintiff / Counter-Defendant*
8 *Nevada Controls, LLC*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 * * *

12 NEVADA CONTROLS, LLC, a Nevada
Limited Liability Company,

Case No.: 3:12-cv-00068-HDM-VPC

13 Plaintiff,

14 v.

**NEVADA CONTROLS, LLC'S
REPLY IN SUPPORT OF
MOTION TO COMPEL**

15 WIND PUMP POWER, LLC, a Kansas
16 Limited Liability Company, SUNFLOWER
WIND, LLC, a Kansas Limited Liability
17 Company; DAN RASURE, an individual,

18 Defendants.
19 _____/

20 Plaintiff, Nevada Controls, LLC, here submits its Reply in support of the Motion
21 to Compel, filed September 25, 2012. (Doc. #33). Despite being served with the
22 Motion to Compel on September 25, Defendants have failed to file an opposition to the
23 Motion, which opposition was due on or before October 12, 2012. Accordingly,
24 Defendants have consented to the Court issuing an order granting the Motion to
25 Compel. LR 7-2(d).

26 Therefore, Nevada Controls respectfully requests that this Court compel
27 Defendants to immediately respond to the outstanding discovery requests, including
28 production of the requested documents. In addition, Nevada Controls respectfully

1 requests an award of costs and reasonable attorneys' fees associated with the
2 preparation of the Motion, to which Plaintiff is entitled pursuant to Rule 37(a)(5)(A) of
3 the Federal Rules of Civil Procedure.

4 Dated: October 17, 2012.

5 McDonald Carano Wilson LLP

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8 LEIGH GODDARD
9 JESSICA WOELFEL

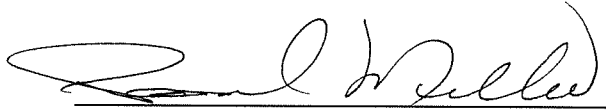
10 Attorneys for Plaintiff / Counter-Defendant
11 Nevada Controls, LLC
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CERTIFICATE OF SERVICE

I hereby certify, under penalty of perjury, that I am an employee of McDonald Carano Wilson LLP and that pursuant to LR 5-3 I caused to be electronically filed on this date a true and correct copy of the foregoing document with the Clerk of the Court using the CM/ECF system; and by depositing a copy of the same in the U.S. Mail, first class postage fully prepaid, addressed to:

Dan Rasure
Wind Pump Power, LLC
Sunflower Wind, LLC
6488 Road 16
Goodland, Kansas 67735

DATED: October 17, 2012.


Pamela Miller